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8	Life Insurance Company, Inc.	
9	UNITED STATES	DISTRICT COURT
10	DISTRICT (OF NEVADA
11	STEFANIE PAONESSA, an individual; AMERICO PAONESSA, an individual,	CASE NO.: 2:22-cv-2074-GMN-NJK
12	Plaintiffs,	CTIPLE ATION AND PRODUCED
13	v.	STIPULATION AND PROPOSED ORDER TO EXTEND THE DEADLINE
14	SIERRA HEALTH AND LIFE INSURANCE	FOR THE PARTIES TO FILE THE JOINT STATUS REPORT
15	COMPANY, INC., a Nevada corporation; INNOVATIONS LV, LLC, a Nevada Limited	(FIRST REQUEST)
16	Liability Company; and DOES and ROES 1 through 10, inclusive,	
17	Defendants.	
18	INNOVATIONS LV, LLC, a Nevada Limited	
19	Liability Company,	
20	Crossclaimant,	
21	V.	
22	SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; and	
23	DOES I through X, and ROE Business Entities I through X, inclusive,	
24	Counterdefendants.	
25		
26	Defendant/Crossclaim Defendant Sierra	a Health and Life Insurance Company,

Defendant/Crossclaim Defendant Sierra Health and Life Insurance Company, Inc. ("Sierra Health"), Plaintiffs Stefanie Paonessa and Americo Paonessa ("Plaintiffs"), and Defendant/Cross-Claimant Innovations LV, LLC ("Innovations") (collectively, the "Parties"), by

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and through their undersigned counsel, hereby stipulate and agree to extend the deadline for the
Parties to file the joint status report as directed in the Minutes of the Court dated December 15
2022 (ECF No. 4). This is the Parties' first request.

- 1. Plaintiffs originally commenced this action by filing a complaint in the Eighth Judicial District Court, Clark County, Nevada, on September 22, 2022.
- 2. Plaintiffs filed an Amended Complaint on September 30, 2022. (ECF No. 1-1 at pp 18-25.)
- 3. On October 27, 2022, Defendant/Cross-Claimant Innovations filed its Answer to Complaint and Crossclaim. (ECF No. 1-1 at pp. 1-17.)
- 4. On November 3, 2022, Sierra Health was served with the Crossclaim via the Nevada Division of Insurance. (*Id.*)
- 5. On November 15, 2022, Sierra Health was then served with the initial pleading, Plaintiffs' Amended Complaint, via the Nevada Division of Insurance. (ECF No. 1-1 at pp 18-25.)
- 6. While pending in the Eighth Judicial District Court, the Parties agreed, and documented their agreement in writing under the local rules of that court, to an extension of time for Sierra Health to respond to the Amended Complaint and the Crossclaim. The Parties believed the litigation of this action was best served by extending the response deadline so that Sierra Health has sufficient time to investigate and respond to the allegations in the pleadings following the timing issues related to service of the pleadings through the Nevada Division of Insurance and the intervening holidays.
- 7. On December 15, 2022, Sierra Health timely removed this action to federal court. (ECF No. 1.)
- 8. On December 15, 2022, this Court entered minute order directing the Parties to submit a joint status report by or before January 16, 2023. (ECF No. 4.)
- 9. On December 16, 2022, Defendant/Cross-claimant Innovations consented to the removal. (ECF No. 5.)

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improper purpose.

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1	10. With the removal to federal court and the application of this Court's rules, the Parties	
2	were preparing to file this stipulation in this Court, in accordance with LR IA 6-1 and 6-2, to extend	
3	the deadline for Sierra Health to respond to the pleadings.	
4	11. The Parties simultaneously engaged in discussions regarding the possible resolution	
5	of certain issues and claims between and among them, which would narrow the dispute but may	
6	also result in divesting this Court of jurisdiction.	
7	12. To facilitate the resolution and narrowing of the issues, and for good cause on the	
8	issue of this Court's jurisdiction, the Parties hereby stipulate and agree to extend to February 28,	
9	2023, the deadline for the Parties to file the joint status report as directed in the Minutes of the Court	
10	dated December 15, 2022 (ECF No. 4).	
11	13. The Parties are optimistic that Sierra Health will be voluntarily dismissed with	
12	prejudice from the action, and that the remaining issues will concern only state law issues, and thus	
13	be subject to stipulated remand back to state court.	
14	This is the first stipulation for an extension of time for Sierra Health to respond to the	
15	pleadings.	
16	This stipulation is made in good faith, and not intended to cause delay, and not filed for an	

ACCELERATED LAW GROUP

By: /s/ Debra L. Spinelli James J. Pisanelli, Esq., Bar No. 4027 Debra L. Spinelli, Esq., Bar No. 9695 Tyler W. Stevens, Esq., Bar No. 16325 400 South 7th Street, Suite 300 Las Vegas, Nevada 89101

DATED this 11th day of January, 2023.

Attorneys for Sierra Health and Life Insurance Company, Inc

/s/ Joseph T. Nold Joseph T. Nold, Esq. 3030 S. Jones Boulevard, Suite 105 Las Vegas, NV 89146

Attorneys for Plaintiffs Stefanie Paonessa and Americo Paonessa

T. JAMES TRUMAN & ASSOCIATES

By: /s/ T. James Truman T. James Truman, Esq. 3654 N. Rancho Drive, Suite 101 Las Vegas, NV 89130

Attorneys for Innovations LV, LLC

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, based on the Parties' stipulation above, that the deadline for the Parties to file the joint status report as directed in the Minutes of the Court dated December 15, 2022 (ECF No. 4) shall be extended to February 28, 2023.

IT IS SO ORDERED.

Dated this 12 day of January, 2023

Gloria M Navarro, District Judge

UNITED STATES DISTRICT COURT